

UNITED STATES DISTRICT COURT

for the
Western District of Texas


United States of America
v.
Victor Jerome REZA

Case No.

EP-14-M-3185-ATB

FILED

AUG - 6 2014

CLERK, U.S. DISTRICT COURT,
WESTERN DISTRICT OF TEXAS
BY  DEPUTY

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 13, 2014 - August 8, 2014 in the county of El Paso in the
Western District of Texas, the defendant(s) violated:

Code Section
18 USC Section 2252(a)(2)

Offense Description
Receipt of Material Involving the Sexual Exploitation of Minors


This criminal complaint is based on these facts:
See attached affidavit

☒ Continued on the attached sheet.

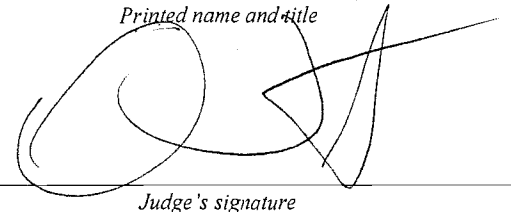
Sworn to before me and signed in my presence.

Date: 08/06/2014

City and state: El Paso, Texas

 #7724
Complainant's signature

Justin A. Tice, HSI Special Agent
Printed name and title


Judge's signature

Anne T. Berton - U.S. Magistrate Judge
Printed name and title

AFFIDAVIT

I make this affidavit on the basis of my personal knowledge as well as on the basis of information furnished to me by other law enforcement officers. I further state that I am a United States (U.S.) Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) Special Agent (SA).

On August 5, 2014, at approximately 6:05 a.m., HSI Special Agents served a federal search warrant at a residence in El Paso, Texas. HSI Special Agents encountered two (2) adult females and one (1) adult male in the residence.

At approximately 6:20 a.m., Special Agent (SA) Justin Tice and SA Andrew Fyffe began an interview with the sole male occupant of the residence Victor Jerome REZA. REZA was read and afforded the opportunity to read the Miranda Rights in the English language. REZA waived his Miranda Rights in writing, orally, and agreed to speak with investigators without an attorney present.

REZA informed investigators that he works in the computer and information technology (IT) field. REZA stated he knows what "peer-to-peer" programs are and how they work. REZA stated that he has used "bit torrent" and "emule" to download programs and pornography to include child pornography in the past. REZA stated he understands the child pornography files he downloaded, via a peer-to-peer program, were available for "sharing" or distribution to others. REZA stated that because of this he would attempt to delete the files quickly to prevent them from being distributed to others. REZA stated that he cannot be certain that he prevented anyone from obtaining child pornography files from his computer while he was sharing the same files.

REZA stated that he likes all kinds of pornography, but prefers "rape pornography," "heavy action pornography but not gang rapes," and pornography that includes young girls "coming of age." REZA stated that he uses various search terms when looking for pornography to include "PTHC." REZA explained to investigators that "PTHC" means "pre-teen hardcore" and it involves children performing sex acts who are "underage." REZA stated "underage" to him is "around 16 years old or younger." REZA stated that he searches for, downloads, views, and masturbates to child pornography approximately one time per month. REZA stated that he has done this for the last three (3) to five (5) years.

REZA stated he has not physically molested any children and denies that he was ever physically abused as a child.

SA Fyffe stated that REZA would not have stopped downloading, viewing, and masturbating to child pornography if investigators had not served the search warrant at his house. REZA agreed with SA Fyffe's statement.

REZA told investigators that the child pornography would be located on his external hard drive next to his desktop computer. REZA stated he had the child pornography on the

external to prevent his wife or daughter from finding it. REZA stated he views the child pornography late at night and is "very cautious" about keeping this activity hidden from his family.

HSI Special Agent (SA)/Computer Forensics Agent (CFA) Joseph Byers located a Western Digital 250 Gigabyte external hard drive (identified by HSI CFA's as "EXT1") near the desktop computer as identified by REZA. An on-site forensic preview of EXT1 was conducted by SA/CFA Antonio Yanez. SA/CFA Yanez previewed eight (8) videos with file names indicative of child sexual exploitation. One (1) of the eight (8) file names previewed is "3 little girls 7yo, 8yo, 11yo sucking grandpa dick – 11yo girl fucked by the ass for other olderman webcam r@y.avi." SA Tice and SA/CFA Yanez confirmed this video file contained CSE material. SA/CFA Yanez confirmed all eight (8) of the previewed video files contain CSE material.

Investigators terminated the interview at approximately 7:15 a.m. REZA provided investigators with a written and sworn affidavit statement admitting to downloading, viewing, and possessing child sexual exploitation material.

At approximately 7:45 a.m., federal prosecution of REZA was accepted by an Assistant United States Attorney for the Western District of Texas. REZA was transported to the HSI El Paso Office at 4191 N. Mesa, El Paso, Texas and processed. REZA was then transported to the El Paso County Detention Facility to await further judicial proceedings.